

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,
MOTION FOR ADDITIONAL ACCESS TO
NON-PUBLIC INFORMATION IDENTIFIED
AS USPS-LR-N2012-1/ NP16
(March 16, 2012)

On March 13, 2012, American Postal Workers Union, AFL-CIO (APWU), filed a Motion for Access to Non-Public Information Identified as USPS-LR-N2012-1/NP16. Accompanying this Motion was the signed certifications of several APWU representatives, consultants and attorneys. Due to the urgent nature of the filing, one APWU representative was unable to complete their Statement of Compliance with Protective Conditions Certifications pursuant to 30 CFR 3007.40(b) in time to be included in the filing. A certification for USPS-LR-N2012-1/NP16 for the following individual has now been completed:

Greg Bell
Vice President
American Postal Workers Union, AFL-CIO

A copy of the Certification is attached hereto.

Counsel has conferred with the Postal Service counsel and has been assured that the Postal Service has no objection to this additional access. For the reasons stated in our March 13, 2012 Motion for Access, APWU respectfully requests that the above named individual be granted immediate access to the non-public Library Reference USPS-LR-N2012/1NP16.

Persons identified by the Postal Service pursuant to Section 3007.2(c) have been provided with a copy of this Motion and accompanying certification today by email.


Respectfully submitted,

Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP16** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	<u>Greg Bell</u>
Firm	<u>American Postal Workers Union, AFL-CIO</u>
Title	<u>Vice President</u>
Representing	<u>American Postal Workers Union, AFL-CIO</u>
Signature	<u></u>
Date	<u>March 15, 2012</u>